

**From:** \_\_\_\_\_  
**To:** NPBL/Evanston/Carver - M/T Mackenzie Rose  
**Subject:** Wednesday, February 19, 2025 10:24:50 AM  
**Date:**

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All,

Good morning. This confirms our agreement from Friday for everyone to hold the dates below for depositions while the parties check with their witnesses to fill slots. The Belt Line and Evanston have requested from Carver the 5 crew members, plus Brian Moore and Leonard Baldassari, plus a 30(b) (6) (topics forthcoming). We recognize Carver has said it no longer controls James Morrissey. The Carver team can indicate its requested witnesses.

This also confirms that the Belt Line has agreed to an extension until March 4 for Carver to respond to the Belt Line's first Requests for Production. We understand Carver intends to serve objections today, but as stated in our call on Friday, the Belt Line's position remains that these are waived. Separately, we asked Carver to produce at its earliest opportunity the electronic data from the tug, which was missing from the 26(a)(1) production (e.g., AIS, VDR, video, etc.). I understand Carver produced this to USCG already and has it available. If I've misstated anything, feel free to clarify. Thanks.

Ryan

- April 21, 22, 23 (afternoon only), 24, 25
- April 28, 29, and 30
- May 5, 7, 8, and 9
- May 19, 20, 21, 22, and 23

**W. Ryan Snow, Esquire**

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